

## SJ-EXHIBIT 23

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION Case No. 17-md-2804

This document relates to: Judge Dan  
Aaron Polster

The County of Cuyahoga v. Purdue  
Pharma, L.P., et al.  
Case No. 17-OP-45005

City of Cleveland, Ohio vs. Purdue  
Pharma, L.P., et al.  
Case No. 18-OP-45132

The County of Summit, Ohio,  
et al. v. Purdue Pharma, L.P.,  
et al.  
Case No. 18-OP-45090

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VOLUME I  
Videotaped Deposition of Kyle J. Wright  
Washington, D.C.  
February 28, 2019  
9:33 a.m.

Reported by: Bonnie L. Russo  
Job No. 3244302

1 Q. Okay. All right.

2 So just a couple more topics, and  
3 then we're done.

4 I want to go back to conversations  
5 that you would have had with distributors and  
6 relating to ratios of controlled versus  
7 noncontrolled substances.

8 A. Okay.

9 Q. Okay?

10 Do you remember having those  
11 conversations with distributors?

12 A. Yes.

13 Q. Okay. And is it -- is it accurate  
14 to say that you knew that it was common for  
15 legitimate pharmacies to have a ratio of  
16 approximately 20 percent of controlled to 80  
17 percent noncontrolled?

18 A. In that area, yes.

19 Q. Okay. And higher percentages of  
20 controlled drugs could be reasonable at times,  
21 right?

22 A. Yes.

23 Q. For example, pharmacies located  
24 right next to a cancer clinic or something like  
25 that.